

David Garrett

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

February 15, 2002

Mr. Thomas S. Sanicola
Environmental Engineer
Modine Manufacturing Company
1500 DeKoven Avenue
Racine, WI 53403-2552

RE: Corrective Action Draft Work Plan Addendum, Modine Manufacturing Company;
Camdenton, Missouri; EPA ID: MOD062439351

Dear Mr. Sanicola:

The Missouri Department of Natural Resources' Hazardous Waste Program has reviewed the Corrective Action Draft Work Plan Addendum for Modine Manufacturing Company (Modine) in Camdenton, Missouri, dated January, 2002. The work plan summarizes Modine's approach for managing the on-site impacted soil stockpile and determining alternative clean-up levels for impacted in-place soil. The work plan was discussed during phone conversations between Ms. Chris Kump, of my staff, and Mr. Dan Price, consultant for Modine. The department approves the work plan providing Modine makes the modifications in accordance with the following comments and per the above-referenced phone conversations.

Section 2.1, Soil Stockpile, page 3, paragraph 2: This section states that depending on weather, scheduling, approval and other factors the staging pile should cease operating by the beginning of the second quarter of 2003. Due to budgeting reasons Modine is planning on removing one quarter of the impacted soil each calendar quarter starting first quarter 2002. An additional quarter was included in the estimate to allow for inclement weather. This information should be included in the work plan.

Section 2.1, Soil Stockpile, page 3, paragraph 4: This section states that confirmation soil samples will be collected beneath the former pile location. This section should also discuss the number of confirmation soil samples to be taken and the sample collection and laboratory analysis methods to be used.

Section 2.2, Alternative Clean-up Levels, page 4, paragraph 2: This section discusses collecting five to ten soil samples from the most contaminated portion of the impacted soil area and analyzing them by the Synthetic Precipitation Leaching Procedure (SPLP) to determine an acceptable residual concentration of vinyl chloride in the site soil. In addition to collecting soil samples for analysis by SPLP, samples should also be collected for analysis of total VOCs (USEPA Method 8260) for comparison.

Section 2.3 Path Forward, page 4, paragraph 2: The work plan states that "Due to the confined, capped nature of the contamination beneath the Modine facility, it is anticipated that no indoor air quality impact has or will occur. Elimination of this exposure pathway will assist in determining that there are no unacceptable human exposures to contamination and thus satisfy the Environmental Indicator 'Current Human Exposures Under Control'." The department



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agrees that the "capped nature of the contamination" will "assist" in partially supporting any Human Exposures Controlled EI determination. Modine is reminded, however, that this is but one component of the subject determination. Modine must provide sufficient support for any statements eliminating indoor air as an exposure pathway. This would include a description of building foundation including the epoxy coating on the building floor and a description of the ventilation system in the building. In addition, this evidence should include comparison of remaining soil and groundwater contamination levels at the site with Superfund Soil Screening Levels or other appropriate criteria for the transfer of contaminants from soil to air and groundwater to air.

Due to the close proximity of the facility to residential areas Modine may need to consider the potential for off-site exposure to contaminants volatilized from groundwater to indoor air. This need or lack thereof will be predicated on findings derived from installation of additional monitoring wells to determine the extent of groundwater impacts related to releases at the facility. Should these impacts be determined to be linked to the facility, groundwater monitoring results from off-site wells will need to be compared to Superfund Soil Screening Levels or other appropriate criteria, for media transfers from groundwater to air.

Again, the issue of on-site and off-site indoor air are but one component of the "Current Human Exposures Under Control" EI. All potentially applicable exposure pathways must be evaluated and actual/potential exposures determined to be acceptable if the "Current Human Exposures Under Control" question is to be answered in the affirmative.

The department appreciates Modine's continued efforts towards proper remediation of contaminated soil at the facility. If you have any questions regarding this letter, feel free to contact Christine Kump, P.E., of my staff at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM



Robert K. Morrison, P.E.
Acting Chief, Permits Section

RKM:cks

c: Mr. David Garrett, U.S. EPA Region VII
Mr. Kurt Hollman, Division of Geology and Land Survey
Ms. Shelley Woods, Attorney General's Office